

**Fill in this information to identify the case:**

Debtor 1 Joshua Luke Frobe

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania

Case number 19-22551-GLT

**Form 4100R**

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: FIRSTKEY MASTER FUNDING 2021 - A COLLATERAL TRUST

Court claim no. (if known):6

Last 4 digits of any number you use to identify the debtor's account: 0005

Property address: 2430 Trotter Drive  
Number Street  
Allison Park, PA 15101  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 08/01/2024  
MM/DD/YYYY

\*The Creditor agrees that all conduit payments have been applied. In an abundance of caution the creditor is filing this response to advise the Debtor and the Court that the account is not current, and is currently due for 08/01/2024 in the amount of \$3,609.73:

08/01/2024-11/01/2024: (4) payments in the amount of \$1,267.08 each, less suspense in the amount of \$1,458.89.

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ \_\_\_\_\_

c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/DD/YYYY

Debtor1 JOSHUA LUKE FROBE  
First Middle Last

Case number (if known) 19-22551-GLT

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

*Check the appropriate box::*

I am the creditor.  
 I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/Ryan Starks Date 11/20/2024  
Signature

Print Ryan Starks Title Attorney  
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.  
Number  Street

Winston-Salem, NC 27103  
City  State  ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**  
*Pittsburgh Division*

<p>IN RE: <u>JOSHUA LUKE FROBE</u></p> <p>FIRSTKEY MASTER FUNDING 2021 - A COLLATERAL TRUST, Movant</p> <p>vs.</p> <p>JOSHUA LUKE FROBE , Debtor</p> <p>and</p> <p>RONDA J WINNECOUR Respondent</p>	<p>Case No. 19-22551-GLT Chapter 13</p> <p>Hearing Date: TBD</p> <p>Hearing Time: TBD</p> <p>Objection Date: TBD</p>
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**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that on this day, I served or caused to be served the Response to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Glenn R. Bartifay, Esq.  
2009 Mackenzie Way  
Suite 100  
Cranberry Township, PA 16066  
*Counsel for Debtor*

Ronda J Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
*Chapter 13 Trustee*

Office of the United States Trustee  
1000 Liberty Avenue  
Suite 1316  
Pittsburgh, PA 15222  
*US Trustee*

Via First Class Mail:

Joshua Luke Frobe  
2430 Trotter Dr  
Allison Park, PA 15101  
*Debtor*

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading “Via CM/ECF electronic notice” and those served by mail will be listed under the heading “Via First Class Mail”.

EXECUTED ON: November 20, 2024

/s/Ryan Starks

Andrew Spivack, PA Bar No. 84439  
Matthew Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
3825 Forrestgate Drive  
Winston Salem, NC 27103  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

**PAWB Local Form 7 (07/13)**



## «AddressBlock» Fill in this information to identify the case:

Debtor 1: Joshua Luke Frobe

Debtor 2:

(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PennsylvaniaCase number: 19-22551Official Form 410S1

Chapter 13

## Notice of Mortgage Payment Change

12/15

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any changes in the installment payment amount. File this form as a supplement to your proof of claim at least 21 days before the new payment amount is due. See Bankruptcy Rule 3002.1.

Name of Creditor: Firstkey Master Funding 2021- A  
Collateral Trust,

Court claim no. (if known): 6-1

Last four digits of any number  
you use to identify the debtor's  
account:

0005Date of payment change: 08/01/2024Must be at least 21 days after  
date of this noticeNew total payment: \$1,267.08

Principal, interest and escrow, if any

## Part 1: Escrow Account Payment Adjustment

Will there be a change in the debtor's escrow account payment? Yes

Attach a copy of the escrow account statement prepared in a form consistent with applicable non-bankruptcy law. Describe the basis for the change.  
If a statement is not attached, explain why:

Current Escrow Payment: \$690.02New Escrow Payment: \$484.31

## Part 2: Mortgage Payment Adjustment

Will the debtor's principal and interest payment change based on an adjustment to the interest rate in the debtor's variable-rate note? No

Attach a copy of the rate change notice prepared in a form consistent with applicable non-bankruptcy law.  
If a notice is not attached, explain why:

Current Interest Rate:

New Interest Rate:

Current principal and interest payment:

New principal and interest payment:

## Part 3: Other Payment Change

Will there be a change in the debtor's mortgage payment for a reason not listed above? No

Attach a copy of any documents describing the basis for the change, such as a repayment plan or loan modification agreement.  
(Court approval may be required before the payment change can take effect.)

Reason for change:

Current mortgage payment:

New mortgage payment:

Debtor 1: Joshua Luke Frobe

Case number (if known): 19-22551

#### Part 4: Sign Here

The person completing the Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this Supplement applies.

Check the appropriate box:

I am the creditor  I am the creditor's authorized agent

(Attach copy of Power of Attorney, if any.)

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information and reasonable belief.

/s/ Tawakoni Hill

Signature

Date: Jun 21, 2024

Print: Tawakoni Hill

Title: Authorized Agent

Company: Liepold, Harrison & Associates

Address: 1425 Greenway Drive, Suite 250  
Irving, TX 75038

Contact Phone:

Email: PCNInquiries@lha-law.com

**UNITED STATES BANKRUPTCY COURT  
Western DISTRICT OF Pennsylvania**

*In Re:*

**Case No. 19-22551**

**Joshua Luke Frobe**

**Chapter 13**

**Debtor(s)**

**CERTIFICATE OF SERVICE**

I hereby certify that on 06/21/2024, a true and correct copy of the foregoing Notice of Mortgage Payment Change was served upon all interested parties pursuant to the Court's CM/ECF system and/or by First Class U.S. Mail.

By: /s/ Tawakoni Hill

Authorized Agent for Creditor  
Liepold, Harrison and Associates  
1425 Greenway Drive, Suite 250  
Irving, TX 75038

Debtor

Joshua Luke Frobe  
2430 Trotter Dr  
Allison Park, PA 15101

Debtor's Counsel

Glenn R. Bartifay  
2009 Mackenzie Way, Suite 100  
Cranberry Township, PA 16066

Trustee

Ronda J. Winnecour  
600 Grant Street, Suite 3250  
Pittsburgh, PA 15219

U.S. Trustee

Office of the United States Trustee  
1000 Liberty Avenue, Suite 1316  
Pittsburgh, PA 15222

(800) 561-4567 FAX: (949) 517-5220

/P1 / 680

JOSHUA LUKE FROBE  
2430 TROTTER DR  
ALLISON PARK PA 15101

YOUR LOAN NUMBER :

DATE: 05/24/24

\*\*\* ANNUAL ESCROW ACCOUNT DISCLOSURE STATEMENT - LAST CYCLES ESCROW ACCOUNT HISTORY \*\*\*

THIS HISTORY STATEMENT COMPARES YOUR PRIOR ANALYSIS CYCLE PROJECTED ESCROW ACTIVITY TO THE ACTUAL ESCROW ACTIVITY BEGINNING AUGUST, 2023 AND ENDING JULY, 2024. IF YOUR LOAN WAS PAID-OFF, ASSUMED, OR TRANSFERRED DURING THIS PRIOR CYCLE, OR THE COMPUTATION YEAR IS BEING CHANGED, ACTUAL ACTIVITY STOPS AT THAT POINT. THIS STATEMENT IS INFORMATIONAL ONLY AND REQUIRES NO ACTION ON YOUR PART.

--- YOUR PAYMENT BREAKDOWN AS OF AUGUST, 2023 IS ---

PRIN & INTEREST	782.77
ESCROW PAYMENT	623.60
SHORTAGE PYMT	66.42
TOTAL	1,472.79

MONTH	-- PAYMENTS TO ESCROW --		-- PAYMENTS FROM ESCROW --		-- ESCROW BALANCE --							
	PRIOR	PROJECTED	ACTUAL	PRIOR	PROJECTED	ACTUAL						
AUG	623.60	*	1224.68	3038.53	*	SCHOOL TAX	3170.99	SCHOOL TAX	1247.20	TLP	5420.82-	ALP
SEP	623.60	*							1870.80		5420.82-	
OCT	623.60	*	1837.02		*		1545.00	HOME INSUR	2494.40		5128.80-	
NOV	623.60	*							3118.00		5128.80-	
DEC	623.60	*	2527.04						3741.60		2601.76-	
JAN	623.60	*	1380.04						4365.20		1221.72-	
FEB	623.60	*							4988.80		1221.72-	
MAR	623.60	*	690.02	3348.94	*	HOMEOWNERS	645.25	COUNTY TAX	1618.21		1176.95-	
			0	645.25		COUNTY TAX						
APR	623.60	*	690.02						2241.81		486.93-	
MAY	623.60	*	2070.06						2865.41		1583.13	
JUN	623.60		E	450.48		CITY TAX			3038.53		1583.13	
JUL	623.60		E						3662.13		1583.13	
TOT	7483.20		10418.88	7483.20					5361.24			

UNDER FEDERAL LAW, WHEN YOUR ACTUAL ESCROW BALANCE REACHES ITS LOWEST POINT, THAT BALANCE IS TARGETED NOT TO EXCEED 1/6TH OF THE ANNUAL PROJECTED DISBURSEMENTS. YOUR LOAN DOCUMENTS OR STATE LAW MAY SPECIFY THAT YOUR LOWEST BALANCE MUST BE A LOWER AMOUNT THAN THE FEDERAL LAW ALLOWS.

UNDER YOUR MORTGAGE CONTRACT OR STATE OR FEDERAL LAW, YOUR TARGETED LOW POINT ESCROW BALANCE (TLP) WAS \$1,247.20. YOUR ACTUAL LOW POINT ESCROW BALANCE (ALP) WAS \$5,420.82-.

BY COMPARING THE PROJECTED ESCROW TRANSACTIONS WITH THE ACTUAL TRANSACTIONS YOU CAN DETERMINE WHERE A DIFFERENCE MAY HAVE OCCURRED. AN ASTERISK (\*) INDICATES A DIFFERENCE IN EITHER THE AMOUNT OR DATE OF THE PROJECTED ACTIVITY AND THE ACTUAL ACTIVITY. THE LETTER "E" BESIDE AN AMOUNT INDICATES THAT THE PROJECTED ACTIVITY HAS NOT YET OCCURRED DUE TO THE DATE OF THIS STATEMENT.

IF THERE ARE NO PRIOR PAYMENTS TO OR FROM ESCROW SHOWN, THERE WAS NO PRIOR PROJECTION TO WHICH THE ACTUAL ACTIVITY COULD BE COMPARED.

Your projected escrow balance consists of the following detail (an \* next to an amount indicates this is a total that represents more than one payment to or disbursement from escrow):

**Escrow payments up to escrow analysis effective date:**

09/22	\$612.34	10/22	\$612.34	11/22	\$5,511.06	*
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\*\*\* ANNUAL ESCROW ACCOUNT DISCLOSURE STATEMENT - PROJECTIONS \*\*\*

PLEASE REVIEW THIS STATEMENT CLOSELY - YOUR MORTGAGE PAYMENT MAY BE AFFECTED. THIS STATEMENT TELLS YOU OF ANY CHANGES IN YOUR MORTGAGE PAYMENT, ANY SURPLUS REFUNDS, OR ANY SHORTAGE OR DEFICIENCY THAT YOU MUST PAY. IT ALSO SHOWS YOU THE PROJECTED ESCROW ACTIVITY FOR YOUR ESCROW CYCLE BEGINNING AUGUST, 2024 AND ENDING JULY, 2025.

----- PROJECTED PAYMENTS FROM ESCROW - AUGUST, 2024 THROUGH JULY, 2025 -----

HOME INSURANCE	1,545.00
COUNTY TAX	645.25
SCHOOL TAX	3,170.99
CITY TAX	450.48
TOTAL	5,811.72
PERIODIC PAYMENT TO ESCROW	484.31

(1/12 OF "TOTAL FROM ESCROW")

\*\*\*\* CONTINUED ON NEXT PAGE \*\*\*\*

----- PROJECTED ESCROW ACTIVITY - AUGUST, 2024 THROUGH JULY, 2025 -----

---- PROJECTED PAYMENTS --

-- ESCROW BALANCE COMPARISON --

MONTH	TO ESCROW	FROM ESCROW	DESCRIPTION	PROJECTED	REQUIRED
				ACTUAL STARTING BALANCE = = = >	
AUG, 24	484.31	3,170.99	SCHOOL TAX	2,646.83	2,029.31
SEP, 24	484.31	1,545.00	HOME INSURANCE	1,586.14 ALP	968.62 RLP
OCT, 24	484.31			2,070.45	1,452.93
NOV, 24	484.31			2,554.76	1,937.24
DEC, 24	484.31			3,039.07	2,421.55
JAN, 25	484.31			3,523.38	2,905.86
FEB, 25	484.31			4,007.69	3,390.17
MAR, 25	484.31	645.25	COUNTY TAX	3,846.75	3,229.23
APR, 25	484.31			4,331.06	3,713.54
MAY, 25	484.31			4,815.37	4,197.85
JUN, 25	484.31	450.48	CITY TAX	4,849.20	4,231.68
JUL, 25	484.31			5,333.51	4,715.99

----- DETERMINING THE SUFFICIENCY OF YOUR ESCROW BALANCE -----

IF THE PROJECTED LOW POINT BALANCE (ALP) IS  
GREATER THAN THE REQUIRED LOW POINT BALANCE (RLP) ,  
THEN THERE IS AN ESCROW SURPLUS....

THE ESCROW SURPLUS IS....

617.52 \*

AT THE TIME OF YOUR BANKRUPTCY FILING, YOUR ESCROW SHORTAGE INCLUDED IN THE POC (PROOF OF CLAIM) IS \$1,440.78.

\*The statement assumes all past due payments have been made toward the loan. If there are past due payments, this amount may not be accurate.

PLEASE CALL THE ABOVE PHONE NUMBER REGARDING THE SURPLUS.

----- CALCULATIONS OF YOUR NEW PAYMENT AMOUNT -----

PRIN & INTEREST	782.77 *
ESCROW PAYMENT	484.31
BORROWER PAYMENT STARTING WITH THE PAYMENT DUE 08/01/24	==> 1,267.08

\* IF YOUR LOAN IS AN ADJUSTABLE RATE MORTGAGE, THE PRINCIPAL & INTEREST PORTION OF YOUR PAYMENT MAY CHANGE WITHIN THIS CYCLE IN ACCORDANCE WITH YOUR LOAN DOCUMENTS.

NOTE : YOUR ESCROW BALANCE MAY CONTAIN A CUSHION. A CUSHION IS AN AMOUNT OF MONEY HELD IN YOUR ESCROW ACCOUNT TO PREVENT YOUR ESCROW BALANCE FROM BEING OVERDRAWN WHEN INCREASES IN THE DISBURSEMENTS OCCUR. FEDERAL LAW AUTHORIZES A MAXIMUM ESCROW CUSHION NOT TO EXCEED 1/6TH OF THE TOTAL ANNUAL PROJECTED ESCROW DISBURSEMENTS MADE DURING THE ABOVE CYCLE. THIS AMOUNT IS \$1,247.20. YOUR LOAN DOCUMENTS OR STATE LAW MAY REQUIRE A LESSER CUSHION. YOUR MORTGAGE CONTRACT AND STATE LAW ARE SILENT ON THIS ISSUE. WHEN YOUR ESCROW BALANCE REACHES ITS LOWEST POINT DURING THE ABOVE CYCLE, THAT BALANCE IS TARGETED TO BE YOUR CUSHION AMOUNT. YOUR ESCROW CUSHION FOR THIS CYCLE IS \$968.62.

YOUR PROJECTED ESCROW BALANCE CONSISTS OF THE FOLLOWING DETAIL (AN \* NEXT TO AN AMOUNT INDICATES THIS IS A TOTAL THAT REPRESENTS MORE THAN ONE PAYMENT TO OR DISBURSEMENT FROM ESCROW):

**Escrow payments up to escrow analysis effective date:**  
04/24 \$690.02 05/24 \$690.02 06/24 \$1,380.04\*

**Escrow disbursements up to escrow analysis effective date:**  
06/24 \$450.48 CITY TAX

**-VERBAL INQUIRIES & COMPLAINTS-**

For verbal inquiries and complaints about your mortgage loan, please contact the CUSTOMER SERVICE DEPARTMENT for Carrington Mortgage Services, LLC, by calling 1-800-561-4567. The CUSTOMER SERVICE DEPARTMENT for Carrington Mortgage Services, LLC is toll free and you may call from 8:00 a.m. to 8:00 p.m. Eastern Time, Monday through Friday. You may also visit our website at <https://carringtonmortgage.com/>.

**-IMPORTANT BANKRUPTCY NOTICE-**

If you have been discharged from personal liability on the mortgage because of bankruptcy proceedings and have not reaffirmed the mortgage, or if you are the subject of a pending bankruptcy proceeding, this letter is not an attempt to collect a debt from you but merely provides informational notice regarding the status of the loan. If you are represented by an attorney with respect to your mortgage, please forward this document to your attorney.

**-CREDIT REPORTING AND DIRECT DISPUTES-**

We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report. As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. If you have concerns regarding the accuracy of any information contained in a consumer report pertaining to this account, you may send a direct dispute to Carrington Mortgage Services, LLC by fax to 800-486-5134 or in writing to Carrington Mortgage Services, LLC, and Attention: Customer Service, P.O. Box 5001, Westfield, IN 46074. Please include your loan number on all pages of the correspondence.

**-MINI MIRANDA-**

This communication is from a debt collector and it is for the purpose of collecting a debt and any information obtained will be used for that purpose. This notice is required by the provisions of the Fair Debt Collection Practices Act and does not imply that we are attempting to collect money from anyone who has discharged the debt under the bankruptcy laws of the United States.

**-HUD COUNSELOR INFORMATION-**

If you would like counseling or assistance, you may obtain a list of HUD-approved homeownership counselors or counseling organizations in your area by calling the HUD nationwide toll-free telephone number at (800) 569-4287 or toll-free TDD (800) 877-8339, or by going to <http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm>. You can also contact the CFPB at (855) 411-2372, or by going to [www.consumerfinance.gov/find-a-housing-counselor](http://www.consumerfinance.gov/find-a-housing-counselor).



(800) 561-4567 FAX: (949) 517-5220

YOUR LOAN NUMBER : [REDACTED]

DATE: 05/24/24

**-EQUAL CREDIT OPPORTUNITY ACT NOTICE-**

The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, or age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has, in good faith, exercised any right under the Consumer Credit Protection Act. The Federal Agency that administers Carrington Mortgage Services, LLC's compliance with this law is the Federal Trade Commission, Equal Credit Opportunity, Washington, DC 20580.

**-SCRA DISCLOSURE-**

**MILITARY PERSONNEL/SERVICEMEMBERS:** If you or your spouse is a member of the military, please contact us immediately. The federal Servicemembers Civil Relief Act and comparable state laws afford significant protections and benefits to eligible military service personnel, including protections from foreclosure as well as interest rate relief. For additional information and to determine eligibility please contact our Military Assistance Team toll free at 1-888-267-5474.

**-NOTICES OF ERROR AND INFORMATION REQUESTS, QUALIFIED WRITTEN REQUESTS (QWR)-**

Written complaints and inquiries classified as Notices of Error and Information Requests or QWRs must be submitted to Carrington Mortgage Services, LLC by fax to 800-486-5134, or in writing to Carrington Mortgage Services, LLC, and Attention: Customer Service, P.O. Box 5001, Westfield, IN 46074. Please include your loan number on all pages of the correspondence. You have the right to request documents we relied upon in reaching our determination. You may request such documents or receive further assistance by contacting the CUSTOMER SERVICE DEPARTMENT for Carrington Mortgage Services, LLC toll free at (800) 561-4567, Monday through Friday, 8:00 a.m. to 8:00 p.m. Eastern Time. You may also visit our website at <https://carringtonmortgage.com/>